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Supp. 649. It would seem, therefore, since the Nevada Statutes provide that orders for the payment of temporary alimony can only be enforced "by attachment, commitment, and requiring security for obedience thereto, or by other means, according to the usages of courts and the circumstances of the case," (Comp. Laws of Nevada, Sec. 504), that the supreme court decided rightly in annulling the order and judgment of the lower court.

EQUITY—INJUNCTION—RIGHT OF A FRATERNAL ORDER TO PREVENT INFRINGEMENT OF ITS NAME.—One Creswill and others instituted proceedings to become incorporated under the laws of the State of Georgia by the name, Grand Lodge, Knights of Pythias of North America, South America, Europe, Asia, Africa and Australia. The Grand Lodge, Knights of Pythias of Georgia, a previously existing unincorporated association, brought suit to enjoin them from any use of the name "Pythias" in connection with the word "Knights." *Held*, that the plaintiffs were entitled to the injunction. *Creswill v. Grand Lodge K. of P. of Georgia* (1910), — Ga. —, 67 S. E. 188.

The principle is well established, that a court of equity will prevent by injunction the fraudulent infringement of a trade name when it will result in injury to the complainant. *Cady v. Schultz*, 19 R. I. 193; *N. K. Fairbanks v. Soap Co.* 42 C. C. A. 376; *Devlin v. Devlin*, 69 N. Y. 212, 25 Am. Rep. 173. The facts of the case bring it within this principle, as the plaintiff owned considerable property and conducted a department of insurance protection in its associate name. The evidence also showed that the defendant's use of the name was with fraudulent intent. The court, however, exhibited a tendency to go beyond this principle in stating, that a fanciful or arbitrary name when applied to an association organized for legitimate purposes, which may be fraternal, charitable and benevolent, will constitute a valid trade name, any infringement of which with knowledge of the facts, will be presumed fraudulent, and allow the aid of a court of equity to be invoked. To invoke the aid of a court of equity to protect a trade name some pecuniary injury must be shown. *Drummond Tobacco Co. v. Randle*, 114 Ill. 412; *Colonial Dames of America v. Colonial Dames of New York*. 29 Misc. Rep. (N. Y.) 10; PAUL, TRADE MARKS, § 174. In the cases relied on by the court for support, the organizations seeking protection had previously been incorporated under that name, and the principle applied is, that the state, having created the corporation by that name, should intervene, when necessary, to protect it. *Society of The War of 1812 v. Society of The War of 1812 of New York*, 62 N. Y. Supp. 355. It is evident that some restriction should be placed on too liberal an application of the term "Trade Name." What appears to be a reasonable limitation is set forth in the recent case of *Grand Lodge, Free, Ancient and Accepted Masons v. Grimshaw et al.*, decided by the Court of Appeals for the District of Columbia, 38 Wash. Law. Rep. 130. The facts were similar in the main to those of the principal case. The court in denying a bill for an injunction said, in substance, that the single claim of each, was the exclusive right to use a name indicating that it is a genuine lodge of an order of Free Masons; courts of equity do not adjudicate the rights of charitable or religious associations to hold themselves out to be the regular and accredited representatives of some peculiar order or religious system.